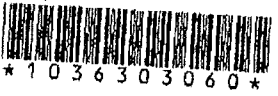


CV-17-600  
Dixon



IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

ANTHONY CORRENTE,  
Plaintiff,  
vs.  
LINGO CONSTRUCTION SERVICES,  
INC.,  
Defendant.

MAR 23 2017  
RICK WARREN  
COURT CLERK  
34

Case No. \_\_\_\_\_

CV-2017-600

PETITION

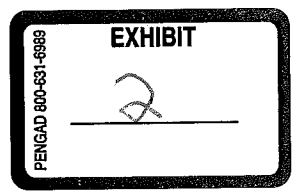
COMES NOW the Plaintiff, Anthony Corrente, for his cause of action against the Defendant Lingo Constructions Services, Inc., alleges and states as follows:

Parties

1. Anthony Corrente is a resident of Oklahoma City, Oklahoma County, Oklahoma.
2. Defendant, Lingo Corrente Services, Inc., is a domestic for-profit business doing business in Oklahoma County, Oklahoma.

Jurisdiction and Venue

3. Plaintiff's claim is for violation of his rights under the Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634, and under the Oklahoma Anti-Discrimination 25 O.S. § 1302(A).
4. All actions giving rise to Plaintiff's claims occurred in Oklahoma County, State of Oklahoma and Defendant may be served there, whereby venue is proper and the Court has jurisdiction over all parties and Plaintiff's claims.
5. Plaintiff has performed any conditions precedent to filing this action by filing a charge with the Equal Employment Opportunity Commission and a "Notice of Rights" was issued on December 22, 2016, and Plaintiff has timely filed this action.



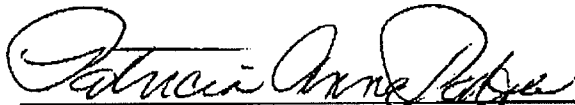
**Statement of Facts**

6. Plaintiff applied for employment with Defendant on or around October 20, 2014 for a position as Project Manager.
7. Plaintiff was interviewed for the position during which his significant qualifications for the position were discussed.
8. Defendant hired a younger project manager with much less experience than Plaintiff for the position.
9. Plaintiff again applied for a position as Project Manager with Defendant on or around April 27, 2015.
10. Plaintiff spoke with Gage Anderson regarding his application on June 8, 2015 at which time he was told Defendant would be going in a different direction and instead would be looking for someone younger, just out of college, who could still learn.
11. Plaintiff emphasized his ability to continue to learn, but he was told the Defendant wanted to hire someone younger.
12. Defendant's actions in rejected Plaintiff's application due to his age constitutes a violation of the Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621-634, and under the Oklahoma Anti-Discrimination 25 O.S. § 1302(A).
13. Plaintiff brought an action before the United States Equal Employment Opportunity Commission and the Commission determined on August 3, 2016 that there was sufficient evidence that Defendant violated the Age Discrimination in Employment Act of 1967.
14. As a direct and proximate result of Defendant's actions in terminating the Plaintiff, Plaintiff suffered injuries and damages, including lost wages (past, present and future, including associated benefits) and has suffered mental anguish and emotional distress.

15. Plaintiff is entitled to an award of attorney fees and costs under 28 U.S.C. § 626(b), in accordance with 29 U.S.C. §, 216(b), and 25 O.S. §1350(G)-(H).

WHEREFORE, the Plaintiff, Anthony Corrente, prays for judgment against the Defendant, Lingo Construction Services, Inc., for compensatory, liquidated, and other damages herein, as applicable, together with costs, pre- and post-judgment interest and attorney's fees against the Defendants in excess of \$75,000.00 and any other relief as may be just and proper.

Respectfully submitted,



PATRICIA ANNE PODOLEC, OBA #21325

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ATTORNEY'S LIEN CLAIMED  
JURY TRIAL DEMANDED